

Environmental Update 11/24

The Midcoast Regional Redevelopment Authority (MRRA) takes its stewardship of the former naval air station seriously. Since it was formed in 2008, it has actively engaged with the US Navy, the Maine DEP, The USEPA, the Town of Brunswick and local citizen groups in the management of both legacy and emergent environmental issues on the former base property.

PFAS well contamination:

At recent public meetings of the Brunswick Town Council and at MRRA Board, a number of people raised concerns about the unfortunate August 19 release of Aqueous Fire Fighting Foam (AFFF), containing PFAS compounds in Hangar 4 and the impacts it may on drinking water wells in and around Brunswick Landing. It's important to note that all drinking water at Brunswick Landing comes from the Brunswick Topsham Water District. With the exception of a well supporting the golf course, there are no private wells on the Brunswick Landing campus.

In light of the public questions and concerns raised regarding the recent AFFF release, we posed several questions to the Navy regarding the state of contaminated wells adjacent to the former base and the testing/remedial procedures moving forward.

1. What are the sources of these contaminated wells and what is the remedy? What is in place now?

Per a November 5th communication from W. Rachelle Knight, the Navy BRAC Environmental Coordinator: "Although there has been significant testing completed in the impacted areas, it's too early to say whether the new release has affected the wells or if it is a result of legacy releases or other causes. MEDEP is conducting quarterly sampling of private wells for the next year (3 more events are expected) and they are sharing data to provide to the public. No data to date exceeds MEDEP drinking water standard for PFAS levels however, three wells exceed the EPA Maximum Contaminant Level (MCL). No wells exceed the DoD action level which is 3x the MCL. Because of the geology, it will take some time for the PFAS to show up from the August 19th release.

Public meetings continue to be a priority moving forward as we recognize the important of transparency on this issue. Commissioner 'Loyzim did a really great job of explaining this at the first public meeting. There is no remedy in place because it is too early in the CERCLA process; however, evaluation of removal actions (including installation of extraction well 11 which went online recently) will inevitably address both the current release and the legacy releases. Navy has reviewed all data collected for the private wells and is planning additional sampling in the near future".

2. Would it be feasible to hold another public forum on environmental issues at the former BNAS in the near future?

The Navy is planning a PFAS open house which will be supported by the Navy's Force Health Protection Command and ideally the local health department. They expect this to occur at the top of the year.

MRRA Actions:

Please note that MRRA is staying "on-top" of this issue and is working with the Town of Brunswick, the Maine DEP, the USEPA and others to find solutions to eliminate any future occurrences. Following, are several of the immediate actions MRRA is undertaking:

1. Seeking a consultant to conduct a "Root Cause Analysis" of the hangar 4 release.
2. Engaged Poole Associates for hangar Risk Assessment and development of interim monitoring plan for the hangar AFFF systems;
3. Engaged Sevee and Mahar Engineers, Inc. (SME) to assist MRRA staff in updating MRRA's current Stormwater Pollution Prevention Plan (SWPPP) and develop a specific PFAS Spill Prevention, Control & Countermeasure (SPCC) plan for the hangars at the Brunswick Executive Airport to address new management protocols for AFFF releases. Also seeking guidance recommendations from USEPA, Maine DEP, the US Coast Guard, and the US Navy on national PFAS spill management protocols and best management procedures;
4. Working with Safespill representatives on refining project proposal and exploring funding solutions for new fire suppression technology that doesn't require AFFF, and;
5. Actively seeking funding opportunities for AFFF replacement technologies from federal and state entities, to include, but is not limited to: Requested funding from FAA – Military Airports Program and Governor (FY 25 budget).

Environmental History at NAS Brunswick:

Former NAS Brunswick's history and mission (1943-2011) required the use, handling, storage, and disposal of hazardous materials and petroleum products including paints, solvents, degreasers, waste oil, fuels, pesticides/herbicides, and household products, as well as landfilling and wastewater treatment operations. The use and disposal of munitions also occurred at NAS Brunswick in some locations. In the past, few (if any) regulations guided activities at the installation, or elsewhere, and little was known about the long-term effects of hazardous materials on human health and the environment. Prior to the 1980s, hazardous materials came into contact with the environment through accidental spills, leaks, and releases; military training practices; and conventional waste

disposal practices. These activities may have resulted in conditions that do not meet today's stricter and more comprehensive environmental standards.

Currently, all hazardous materials and wastes generated at former NAS Brunswick are managed in accordance with state and federal regulations and are disposed of or recycled offsite at licensed waste disposal facilities. Past releases to the environment are being addressed by the Navy's ERP. The Navy's focus on cleanup of historical contaminant releases and preventing future releases enables the Navy to reduce any adverse effects or potential threat to the public health, public welfare, or the environment.

The Navy identified possible environmental contamination caused by operations at the installation, prior to state and federal environmental regulatory involvement. The Navy conducted a series of initial investigations at the facility. These initial investigations were detailed in the following reports: Remedial Investigation Reports (E.C. Jordan, 1990a); Phase I Feasibility Study and Development of Screening Alternatives and Feasibility Study of NAS Brunswick (E.C. Jordan, 1990b and E.C. Jordan, 1992) and the Initial Assessment Study of Naval Air Station Brunswick, (Roy F. Weston, Inc. 1983). These reports are available in the Information Repository and online Administrative Record. All investigations and documents associated with the former NAS Brunswick IRP have been completed in accordance with the CERCLA site management process. The CERCLA process is a multi-step cleanup process that begins with site discovery or notification to EPA of possible releases of hazardous substances. Sites are discovered by various parties, including citizens, state agencies, and EPA Regional offices. Some sites may be cleaned up under other authorities. EPA then evaluates the potential for a release of hazardous substances from the site using the steps in the Superfund cleanup process. Community involvement, enforcement, and emergency response can occur at any time in the process. A wide variety of characterization, monitoring, and remediation technologies are used through the cleanup process.

Former NAS Brunswick has nine active IRP sites; two of these sites (Quarry Area and Site 12 - EOD Area) were initially investigated under the Navy's Military Munition Response Program and are being addressed through the IRP. The current active sites have remedies in place that include active remediation (where the Navy is operating and maintaining a treatment system), long-term monitoring, land use controls (which the Navy is response for monitoring), or a combination thereof.

A total of 21 sites at NAS Brunswick have been or are being investigated under the Navy's IRP and in accordance with the requirements of CERCLA and the Superfund Amendments and Reauthorization Act, also known as SARA. Currently, there are nine IRP sites that have remedies in place with Records of Decision that were finalized after the listing of the facility on the NPL in July 1987.

The NAS Brunswick Restoration Advisory Board (RAB) has been actively involved in the cleanup program at the facility since 1995. A Technical Review Committee (TRC) was

established in 1988 and operated prior to the formation of the RAB. RAB members include Navy, MEDEP, EPA, and various community representatives who provide coordinated direction to IRP activities at the former NAS Brunswick. A community co-chair and a Navy co-chair lead the group's participation and input for the ongoing cleanup program at the former NAS Brunswick. Prior to the COVID-19 pandemic, in-person RAB meetings were 8 Former Naval Air Station Brunswick, Maine Community Involvement Plan CTO N4008518F5894 held on a triannual basis in 2016 and 2017 and on a biannual basis in 2018 and 2019. Since the beginning of the pandemic, two to three RAB meetings have been held per year, primarily via virtual format. Technical meetings have also been held periodically, with the most recent technical meeting held in September 2019 at Bowdoin College.

Brunswick Area Citizens for a Safe Environment (BACSE) was founded in 1990 as a non-profit organization under EPA's Technical Assistance Grant³ (TAG) program. BACSE has received EPA TAG support for more than 30 years, with grant funds received totaling \$490,000 as of January 2023. BACSE comprises a group of individuals from the local community involved in the ongoing environmental cleanup process in support of the Navy's IRP, including as citizen members of the RAB with active participation in every meeting since the RAB's formation. BACSE was formed to monitor the investigation and remediation of the former NAS Brunswick, and works to educate and involve area people in the effort to obtain a safe cleanup at the site. The ongoing collaboration among the Navy, regulatory agencies, RAB members, the community, MRRA, and BACSE has been a key element of the continuing progress in the environmental remediation program and property transfer over the last 30 years.

More detailed information on the NAS Brunswick environmental issues and remediation plan can be found in the repository at the Brunswick Public Library, online Administrative Record, and summarized in the 2023 Community Involvement Plan and the slide decks of the RAB meetings, both of which are included on this website.